

Alejandro Oliveras Rivera, Esq.

Exhibit 4

CHAPTER 13 TRUSTEE

*P.O. Box 9024062
San Juan, Puerto Rico 00902-4062
Tel: (787) 977-3500 Fax: 977-3521
www.ch13sjr.com*

*500 Tanca Street
Ochoa Building, Suite 601
Old San Juan, PR 00901*

April 23, 2020

Mr. Nomar Andre Torres Laboy
Urbanización Villa del Carmen
Calle Arecibo J-24
Caguas, PR 00725

Re: **ANA T FIGUEROA ROMAN**
Bankruptcy Case No. 19-03969-BKT

Dear Mr. Torres Laboy:

I represent Mr. Alejandro Oliveras Rivera, appointed by virtue of 28 U.S.C. 586 (b) to be the standing Chapter 13 Trustee, for the administration of the bankruptcy estate of debtor, Ms. Ana T. Figueroa Roman, who filed for bankruptcy relief on July 12, 2019. See attached notice of appointment.

Upon investigation of Debtor's financial affairs pursuant to 11 U.S.C 1302 which in turn makes reference to 11 U.S.C. 704(a)(4), Trustee has heard testimony and has received evidence that on January 16, 2018, debtor Figueroa Roman transferred by virtue of a sale, real property consisting of a lot of land located in Bo. Canaboncito, Caguas. Per the information available, the lot of land was worth approximately \$95,000.00. The lot was sold to you for \$15,000.00.

Hence, the transaction took place within two (2) years before the date of the bankruptcy filing of the bankruptcy case of Ana Figueroa Roma. Evidence of the transaction is attached to this letter. Please be advised that the sale made to you constitutes and is subject of an avoidance action by the Standing Chapter 13 Trustee under Section 11 U.S.C. 548 of the Bankruptcy Code.

This letter is a formal request for the turnover to the Chapter 13 Trustee of the real property purchased from Ana Figueroa Roman within the next fifteen (15) calendar days from the receipt of this letter. In this respect, we intend to take all necessary and appropriate legal steps to recover this property, which we begin through the instant letter.

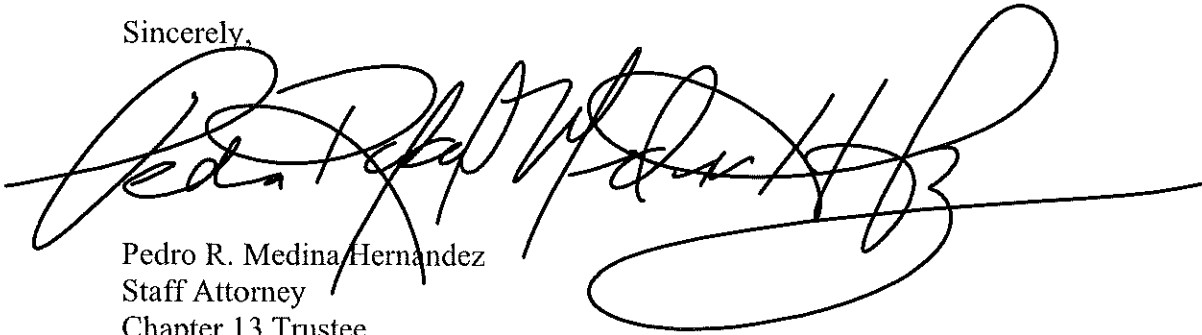
In order for this transfer to take place, it is highly advisable that you obtain legal representation with specialized knowledge of bankruptcy law so that contact with the Chapter 13 Trustee's office is established to formalize the transfer.

If contact is not made within the next fifteen (15) calendar days we will initiate judicial action and file adversary proceeding against you in the Bankruptcy Court for the District of Puerto Rico, for the turnover of the real property, including interest, costs and attorney's fees in favor of the bankruptcy estate.

Case number 19-03969-BKT
Page 2

Below you will find the necessary contact information

Sincerely,

A large, stylized handwritten signature in black ink, likely belonging to Pedro R. Medina Hernandez. The signature is fluid and cursive, with a long horizontal line extending from the bottom right.

Pedro R. Medina Hernandez
Staff Attorney

Chapter 13 Trustee

Alejandro Oliveras Rivera

pmedina@ch13sju.com

P.O. Box 9024062

San Juan, Puerto Rico 00902-4062

c. Ignacio Garcia Franco.

USPS Tracking®**Track Another Package +****Tracking Number:** 70142120000074880644

Remove X

Your item was delivered to an individual at the address at 10:52 am on May 2, 2020 in CAGUAS, PR 00725.

✓ Delivered, Left with Individual

May 2, 2020 at 10:52 am
CAGUAS, PR 00725

Feedback

Get Updates ∨

Text & Email Updates

Tracking History

Product Information

See Less ^**Can't find what you're looking for?**

Go to our FAQs section to find answers to your tracking questions.

UNITED STATES POSTAL SERVICE
PR 000

02 MAY 20

PM 11

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

ALEJANDRO OLIVERAS RIVERA
CHAPTER 13 TRUSTEE
PO BOX 9024062
SAN JUAN, PR 00902-4062

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Noruega A. Torres Laboy
urb. Villa del Carmen
J-24 Calle Arecibo
Caguas PR 00725 0725

2. Article Number

(Transfer from service label)

7014 2120 0000 7488 0644

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

Domestic Return Receipt

102595-02-M-1540

Alejandro Oliveras Rivera, Esq.

Exhibit 6

CHAPTER 13 TRUSTEE

*P.O. Box 9024062
San Juan, Puerto Rico 00902-4062
Tel: (787) 977-3500 Fax: 977-3521
www.ch13sju.com*

*500 Tanca Street
Ochoa Building, Suite 601
Old San Juan, PR 00901*

September 29, 2020

Mr. Nomar Andre Torres Laboy
Urbanización Villa del Carmen
Calle Arecibo J-24
Caguas, PR 00725

Re: **ANA T FIGUEROA ROMAN**
Bankruptcy Case No. 19-03969-BKT

Mr. Torres Laboy:

On April 23, 2020, we directed a letter to you via certified mail (7014-2120-0000-7488-0644) as formal request in order for you to turnover to the Chapter 13 Trustee real property consisting of a lot of land located in Bo. Canaboncito, Caguas, that you purchased from Ana Figueroa Roman on January 16, 2018 for \$15,000.00. As explained in said letter, I represent Alejandro Oliveras Rivera, the standing Chapter 13 Trustee that administers the bankruptcy estate of debtor, Ms. Ana T. Figueroa Roman.

We had informed you that such sale constitutes and is subject of an avoidance action by the Standing Chapter 13 Trustee under Section 11 U.S.C. 548 of the Bankruptcy Code.

We further advised for you to seek legal representation with specialized knowledge of bankruptcy law regarding this matter. As of today, we have not received communication from you nor any legal representation.

Taking into consideration of the events occurred regarding the current health crisis related to COVID-19, with this letter, we intend to reach and establish communication with you or with your legal representative one more time before initiating such action in order to discuss the possibilities of reaching an agreement and avoid the costs of litigating the matter.

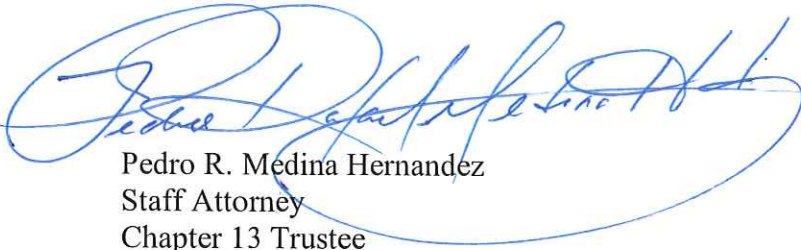
If contact is not made within the next ten (10) calendar days, please be advised, that we will initiate judicial action and file the corresponding adversary proceeding against you in the Bankruptcy Court for the District of Puerto Rico for the turnover of the real property, including interests, costs and attorney's fees in favor of the bankruptcy estate.

Case number 19-03969-BKT
Page 2

Attached hereto you will find copy of the previously sent letter and the corresponding attachments, along with copy of the United States Postal Service webpage, with the tracking number (7014-2120-0000-7488-0644) which indicates that the prior letter was received to the address it was sent on May 2, 2020.

Below you will find the necessary contact information

Sincerely,



Pedro R. Medina Hernandez
Staff Attorney

Chapter 13 Trustee

Alejandro Oliveras Rivera

pmedina@ch13sju.com

P.O. Box 9024062

San Juan, Puerto Rico 00902-4062

787-977-3500 (ext 244)



Track Another Package +

Tracking Number: 70142120000074881870

Remove X

Your item was delivered to an individual at the address at 5:13 pm on October 5, 2020 in CAGUAS, PR 00725.

Delivered, Left with Individual

October 5, 2020 at 5:13 pm
CAGUAS, PR 00725

Feedback

Get Updates v

- Text & Email Updates

v
- Tracking History

v
- Product Information


v

See Less ^

Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

0287 8842 0000 0272 4702

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <input type="checkbox"/> A</p> <p><i>[Signature]</i> <input type="checkbox"/> A</p>	
<p>1. Article Addressed to:</p> <p><i>Alfonso A. Labea</i></p> <p><i>Calle Arecibo J-24</i></p> <p><i>Caguas, PR 00725</i></p>  <p>9590 9402 3284 7196 4145 11</p>		<p>B. Received by (Printed Name) C. Date of</p> <p><i>[Signature]</i> <i>[Signature]</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p>If YES, enter delivery address below: <input type="checkbox"/> Y <input type="checkbox"/> N</p> <p><i>[Circular Postmark: OCT 05 2020]</i></p>	
<p>2. Article Number (Transfer from service label)</p> <p>7014 2120 0000 7488 1870</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Ex</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Ma</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Registered Ma</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Delivery</p> <p><input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Return Receipt</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Conf</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery <input type="checkbox"/> Signature Conf</p> <p><input type="checkbox"/> Restricted Delivery <input type="checkbox"/> Restricted Deli</p>	

PS Form 3811, July 2016 PSN 7530-02-000-9053

Domestic Return